

[SEE SIGNATURE PAGE FOR COUNSEL]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

ED DAIE,

Plaintiff,

v.

Defendants,

THE REED GROUP, INTEL
CORPORATION, CLAIM APPEAL
FIDUCIARY SERVICES, and Does 1-50

) Case No.: 3:15-cv-05255-WHA
)
) **STIPULATION AND ~~PROPOSED~~**
) **ORDER FOR EXTENSION OF TIME**
) **FOR PLAINTIFF TO FILE**
) **OPPOSITION BRIEF**
)
)
) Date: July 21, 2016
) Time: 8:00 AM
) Courtroom: 8 (19th Floor)
) Judge: Hon. William Alsup
)
)
)
)
)

STIPULATION FOR EXTENSION OF TIME

Plaintiff Ed Daie and Defendants Intel Corporation, Reed Group, and Claim Appeal Fiduciary Services hereby stipulate and move the Court for an Order extending the time for Plaintiff to file his Opposition Brief against Defendants' Motion for Summary Judgment. In support hereof, the parties show the Court as follows:

- 1 1. On June 10, 2016, Defendants filed a Motion for Summary Judgment on
- 2 Plaintiff's claim. In support of the motion, Defendants filed 51 exhibits from the
- 3 Administrative Record, totaling 2,643 pages in length.
- 4
- 5 2. At the time of Defendants' filing, Plaintiff's counsel was out of the country on
- 6 previously scheduled family vacation. Counsel did not return to the office until
- 7 June 16, 2016.
- 8
- 9 3. Currently, pursuant to Local Rule 7-3(a), Plaintiff's Opposition Brief is due to be
- 10 filed on June 24.
- 11
- 12 4. Plaintiff's counsel does not believe that 8 days is sufficient time to adequately
- 13 respond to Defendant's Motion for Summary Judgment, given the complexity
- 14 and volume of the Administrative Record in dispute. Plaintiff's counsel believes
- 15 that this matter can be resolved on summary judgment; therefore, its response
- 16 to Defendant's motion is of paramount importance.
- 17
- 18 5. Plaintiff's counsel contacted Defendant's counsel on June 20 to discuss its
- 19 agreement to a two-week extension of time for the filing of its Opposition.
- 20 Defendant's counsel had no objection to the extension and agreed to the
- 21 proposed stipulation.
- 22 6. This request is not brought for the purpose of delay, but to give Plaintiff's
- 23 counsel adequate time to construct and respond to Defendant's motion.

24 WHEREFORE, the parties respectfully request that the Court grant Plaintiff a

25 two-week extension for the filing of its Opposition Brief. The Opposition would be due

26 on July 8 and Defendant's Reply would be due on July 15. In order to give the Court

27 adequate time to review the filings, the parties request that the motion hearing and

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1 further case management conference be continued until August 4, 2016.

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3 Dated: June 22, 2016

Respectfully submitted,

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19 Attorney for Defendants
20 INTEL CORPORATION, REED GROUP,
21 and CLAIM APPEAL FIDUCIARY SERVICES
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~~[PROPOSED]~~ ORDER

PURSUANT TO STIPULATION OF THE PARTIES, IT IS HEREBY ORDERED that the deadline for Plaintiff to file his Opposition Brief is extended until July 8. Defendant's Reply Brief is due July 15. The motion hearing and further case management conference will be continued until Thursday, August 4 at 8:00 a.m. in Courtroom 8, 19th Floor, 450 Golden Gate Avenue, San Francisco, CA 94102.

Dated: June 22, 2016.



Hon. William Alsup
United States District Judge